

## EXHIBIT 315

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CONFIDENTIALITY REVIEW

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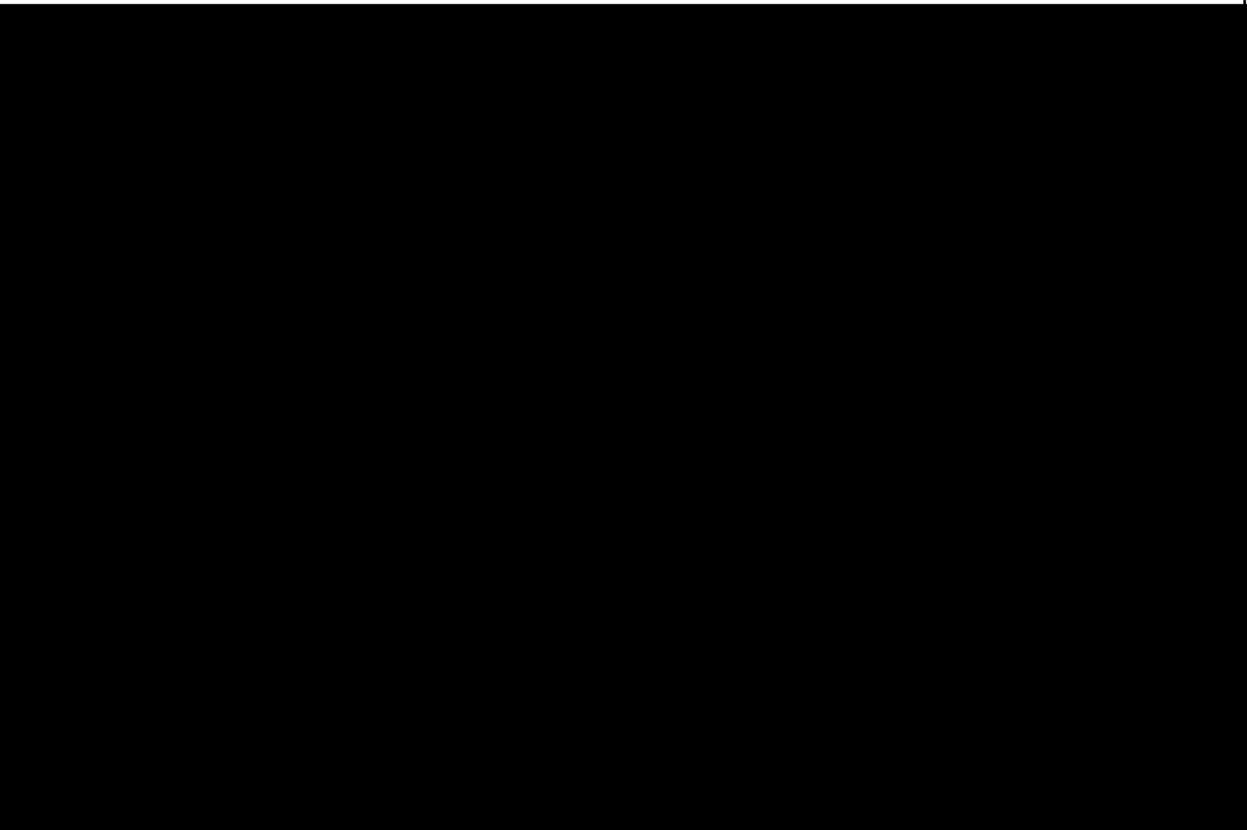
1 for unusual orders of unusual size as the  
2 orders were being processed.

3 Q. And how would they determine  
4 whether an order was of unusual size?

5 A. These were --

6 MS. TABACCHI: Beyond the  
7 scope.

8 THE WITNESS: These were  
9 long-tenured associates that  
10 understood the business and the fact  
11 that we were self-distributing. So  
12 they saw the -- they saw the patterns.  
13 They worked with it every single day.



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1 the policy you're referring to? Where it  
2 says "From as early as 1994 until 2010,  
3 employees in Walmart's pharmacy distribution  
4 centers reviewed controlled drug stock  
5 exception reports, followed up on orders by  
6 speaking with pharmacists, and escalated  
7 issues to market and/or regional leadership  
8 as needed to investigate orders and to  
9 resolve concerns."

10 Is that the policy you're  
11 referring to?

12 A. Yes. As well as the bullet  
13 that's at the very bottom of the page. So  
14 I'm on my document that, for the entire  
15 relevant time period, our distribution  
16 associates monitored orders.

17 Q. Okay. Now, let's go in 2006,  
18 what specifically were the associates doing  
19 to monitor orders?

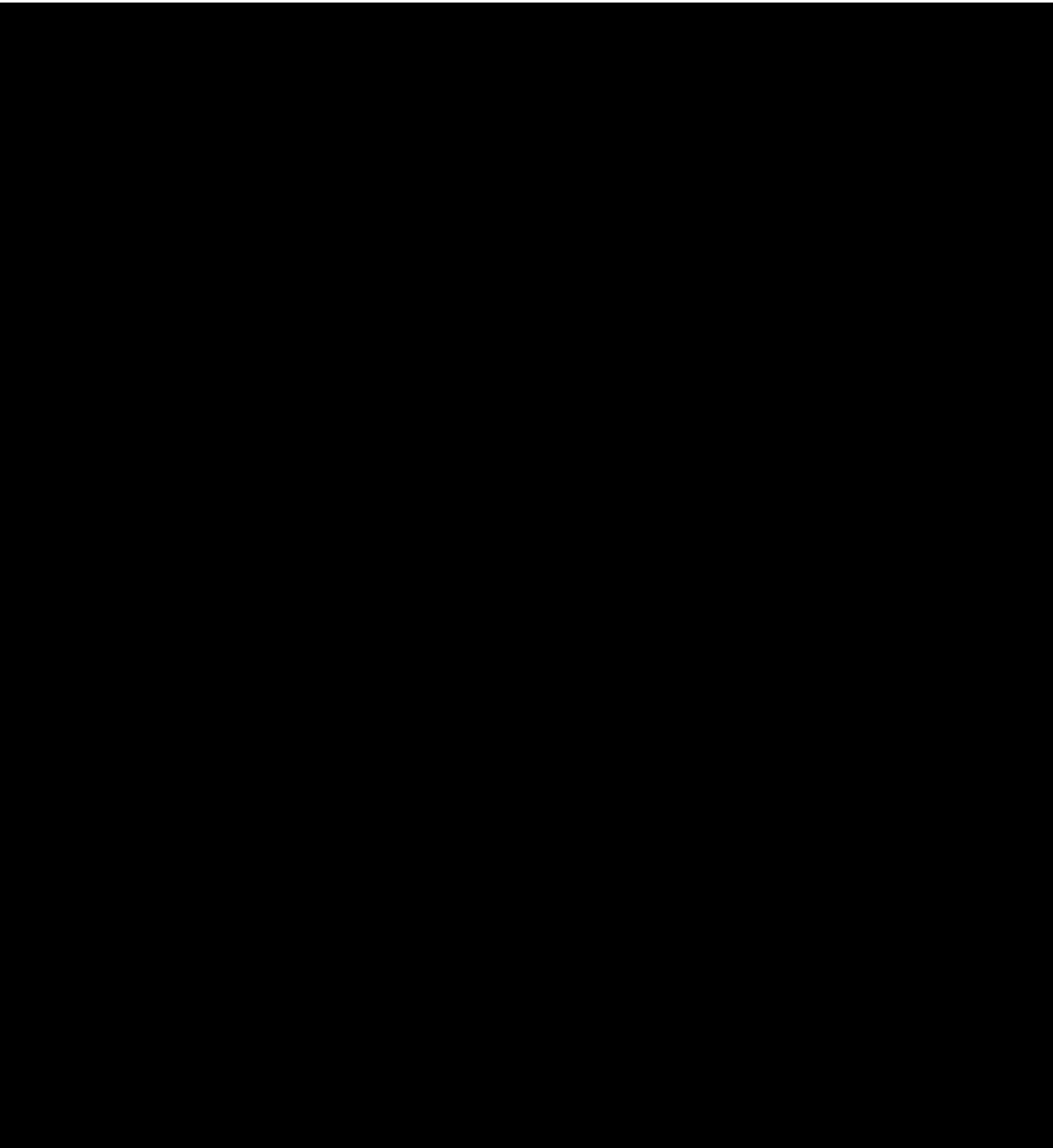
20 MS. TABACCHI: Object to the  
21 form.

22 THE WITNESS: They were  
23 monitoring orders as they came into  
24 the distribution center, and again

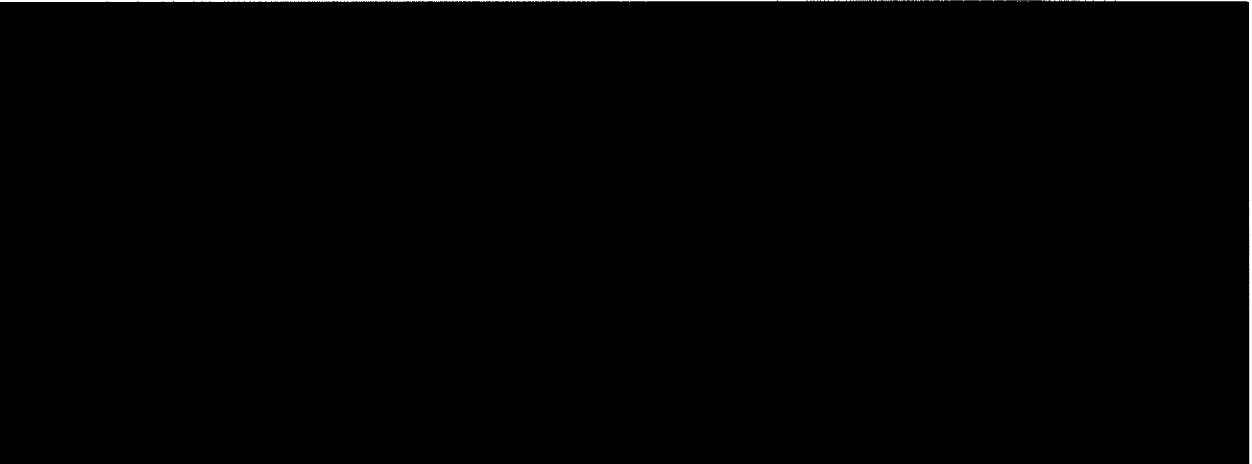
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1                   based on their knowledge and  
2                   experience of the operations. They  
3                   were looking for outliers. Things  
4                   that were outliers for them -- for  
5                   their knowledge.

6                   Q.                   (BY MR. BOWER)    Okay.    And



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7                   training as -- as the associates came  
8                   in around what their duties and  
9                   responsibilities were.

10                  Q.           (BY MR. BOWER)   And what  
11                  specific training was provided in connection  
12                  with monitoring for orders of controlled  
13                  substances?

14                  MS. TABACCHI:   Same objections.

15                  THE WITNESS:   I don't have  
16                  specific to that -- to that topic.  
17                  What they understood was their  
18                  responsibilities, how to perform their  
19                  duties in their area of  
20                  responsibility, and the nature of the  
21                  items that they were --

22                  Q.           (BY MR. BOWER)   Well, how do



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18                   What did Scott tell you with  
19                   respect to the training for associates who  
20                   were reviewing orders of substances in 2007?

21                   A.           What he told --

22                   MS. TABACCHI: Object to the  
23                   form.

24                   THE WITNESS: What he told me

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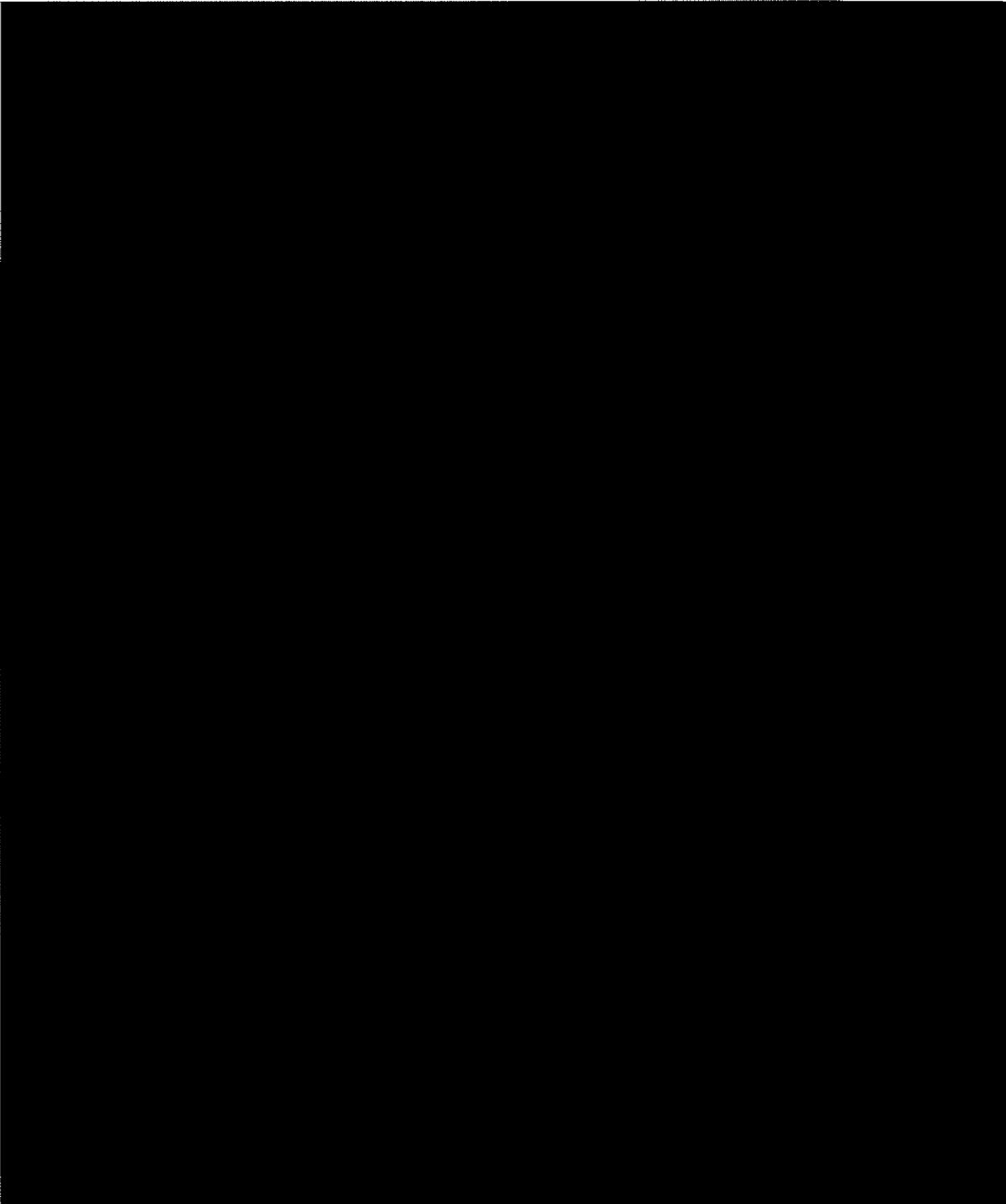
1                   was that there were long-tenured  
2                   logistics associates that had -- many  
3                   of them had been in that building  
4                   since the day that it opened. They  
5                   understood their -- they understood  
6                   the products that they were  
7                   distributing. They understood their  
8                   role. And they were all engaged in  
9                   executing the policies and practices  
10                  at DC '45.

11                  Q.           (BY MR. BOWER) So is it a fair  
12                  statement that it was more their experience  
13                  and specific training that he had relied on  
14                  in reviewing orders for controlled  
15                  substances? ,

16                  MS. TABACCHI: Object to the  
17                  form.

18                  THE WITNESS: Their -- learning  
19                  how to do their job would be part of  
20                  their training. And Walmart has other  
21                  training plans. So to -- but specific  
22                  to order monitoring, it was part of  
23                  the job that they were trained to do.

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21 Q. (BY MR. BOWER) Were these  
22 controlled drug stock exception reports used  
23 by the associates at DC 6045 to monitor  
24 orders for controlled substances as they

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1 were -- came into the DC?

2 MS. TABACCHI: Object to the  
3 form.

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8                   MS. TABACCHI: Zach, object to  
9                   the form. You need to read the entire  
10                   bullet and we've been on this bullet  
11                   for a long time.

12                   MR. BOWER: We have, but we  
13                   haven't got much answer on it, have  
14                   we?

15                   MS. TABACCHI: You're just not  
16                   satisfied with the answer you have.

17                   MR. BOWER: No, I am satisfied.  
18                   I just don't think the witness  
19                   understands what I'm asking, and I'm  
20                   trying to ask it in a way that she  
21                   maybe understands.

22                   Q.           (BY MR. BOWER) So my question  
23                   is, when these orders are escalated to market  
24                   and/or region leadership as needed, what did

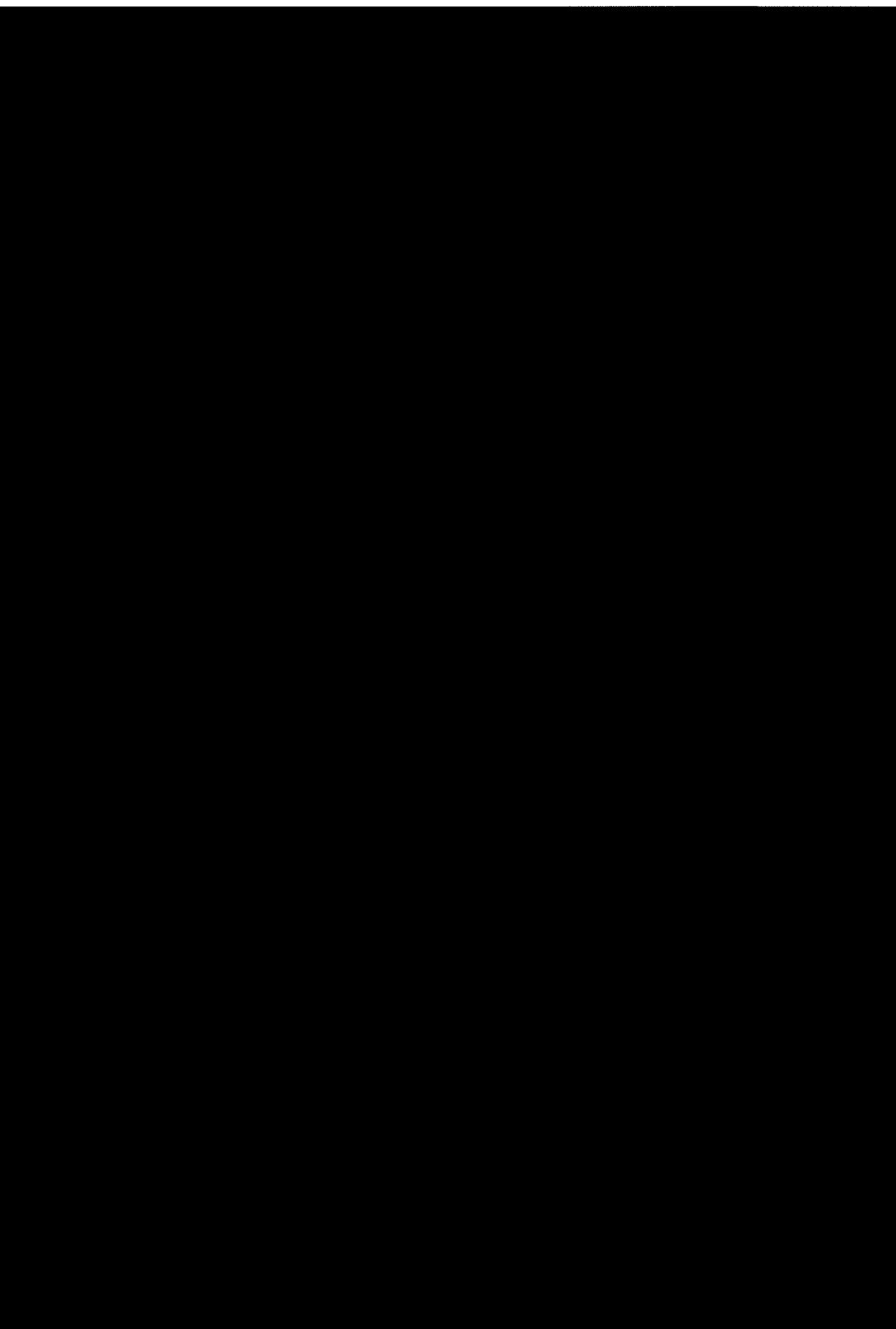
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1 those folks do? I'm just trying -- what was  
2 the policy as to what those folks were  
3 supposed to do?

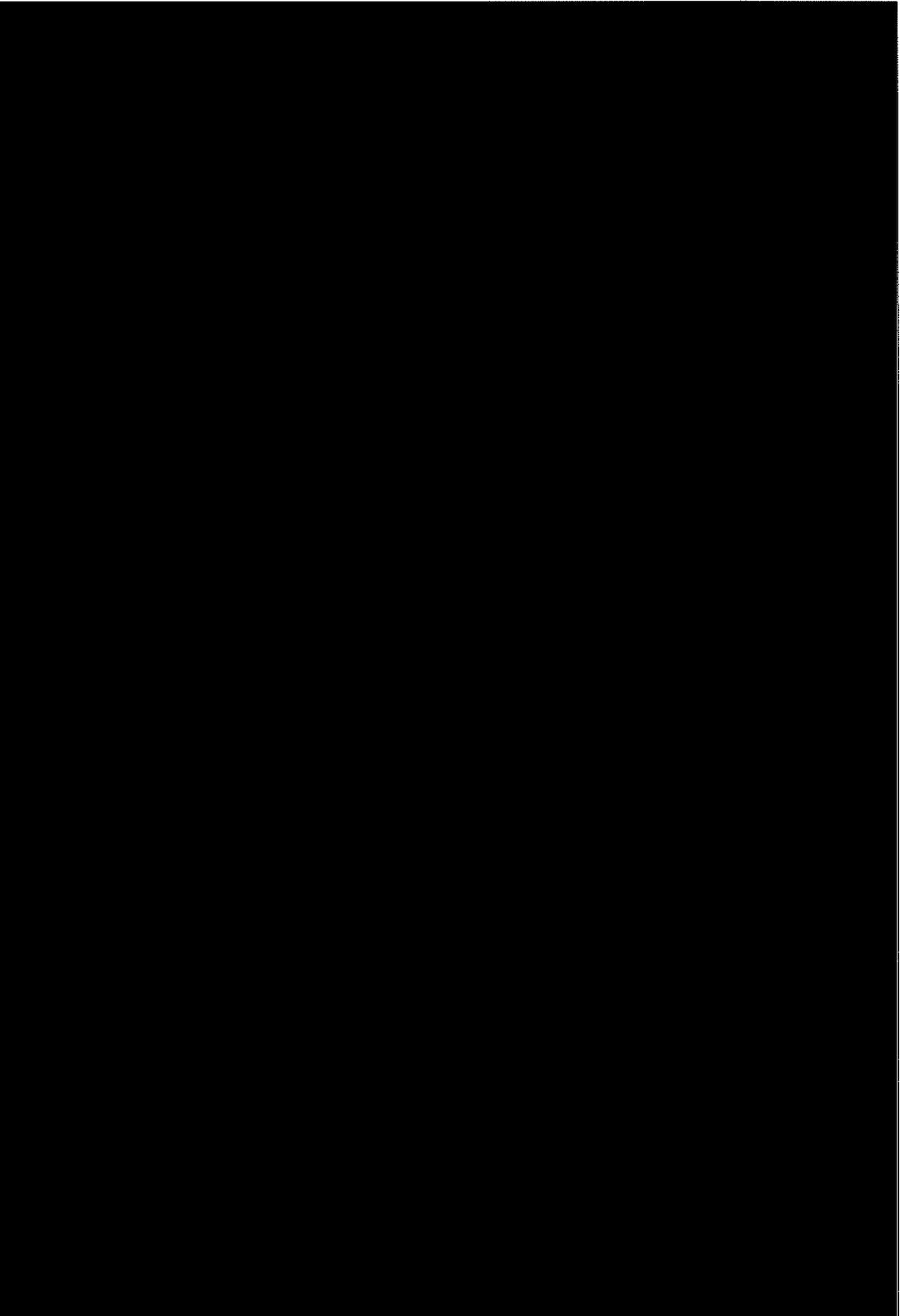
4 MS. TABACCHI: Asked and  
5 answered.

15 It says "as needed."

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7 Q. (BY MR. BOWER) Okay. Because  
8 I think I understand what you're saying,  
9 because Mr. Abernathy, for example, testified  
10 that he would do some reports if he was the  
11 first one in the office, for example.

12       Correct?

13           A.        Correct. I read that in his

14       deposition

15 Q. So under that circumstance, he  
16 would be the one responsible for reporting to  
17 the DEA a suspicious order?

18 MS. TABACCHI: Object to the  
19 form.

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7                   you're asking.

8                   Q.           (BY MR. BOWER)  And I  
9                   appreciate that.  Bullet point 3 refers to  
10                  monthly reports; correct?

11                  A.           Correct.

12                  Q.           Okay.  So those reports  
13                  wouldn't have been used during this time  
14                  period, at least, to identify an order that  
15                  came in on a specific day --

16                  A.           Now I understand the question.

17                  Q.           -- for you; correct?

18                  A.           Correct.

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7                   A.        The enhanced thresholds were  
8        calculated using a year's worth of shipment  
9        data, and then applying a formula, which was  
10      the average weekly order, plus three standard  
11      deviations over that 52-week shipment date.

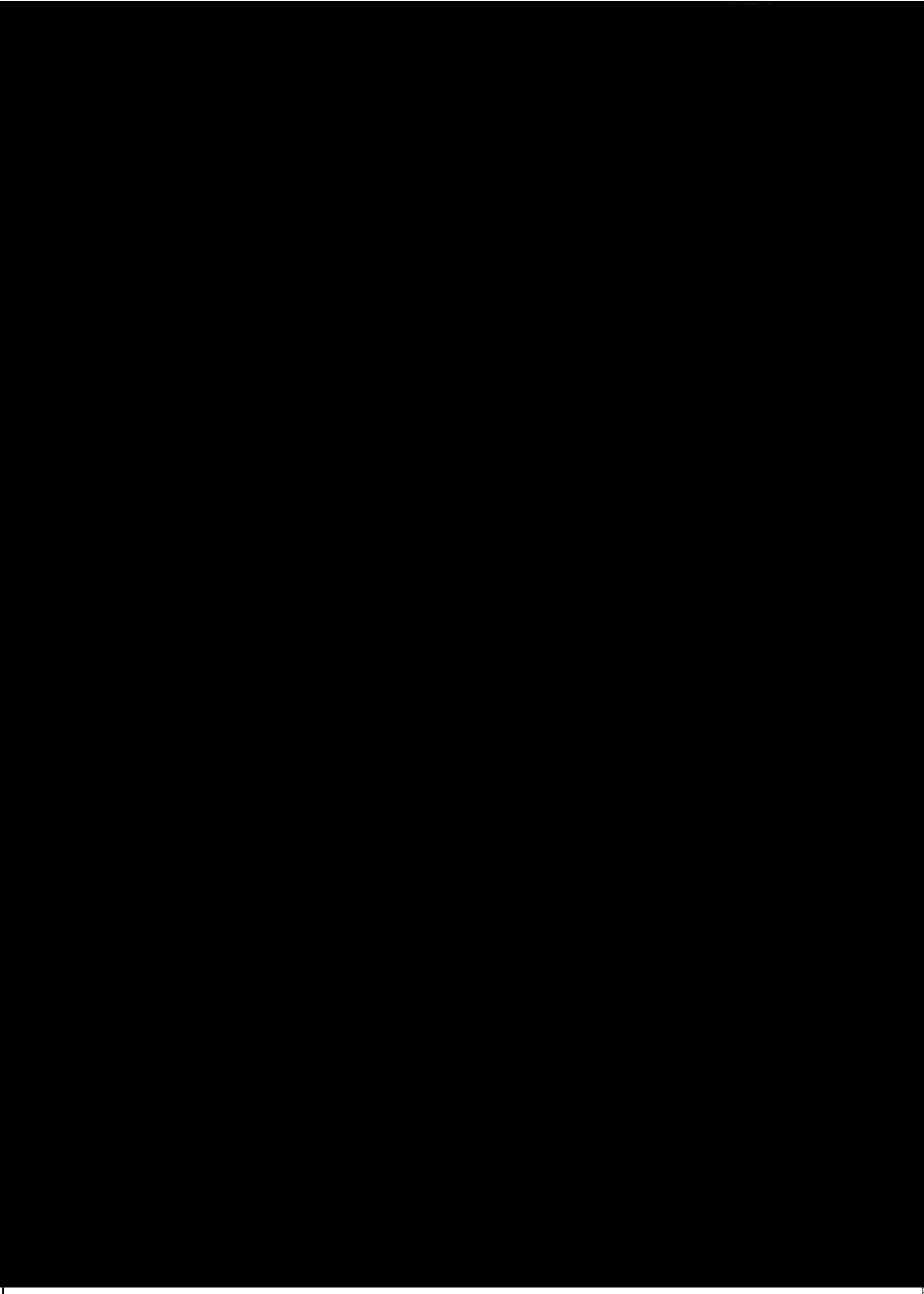
12                  Q.        And when that formula was used,  
13      would that provide the enhancements for a  
14      particular store?

15                  MS. TABACCHI: Object to the  
16      form.

17                  THE WITNESS: It was store and  
18      item specific. And there were  
19      additional defaults that were applied  
20      to those thresholds as they were  
21      calculated.

22                  Q.        (BY MR. BOWER) And can you  
23      describe for us how those defaults -- let me  
24      break that down a little bit.

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1 consider to be too few?

2 MS. TABACCHI: Same objections.

3 THE WITNESS: It would be

4 something that didn't make sense for

5 the business. That we were reviewing